



NADY SYSTEMS, INC.

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December 4, 2013

VIA ELECTRONIC SUBMISSION

TO: Federal Communications Commission
445 12TH Street, SW
Washington, DC 20554

Re: Ex Parte, In the Matter of: WT Docket No. 08-166, Revision to Rules Authorizing the Operation of Low Power Auxiliary Stations in the 698-806 MHz Band; WT Docket No. 08-167, Public Interest Spectrum Coalition, Petition for Rulemaking Regarding Low Power Auxiliary Stations, Including Wireless Microphones, and the Digital Television Transition; ET Docket No. 10-24, Amendment of Parts 15, 74 and 90 of the Commission's Rules Regarding Low Power Auxiliary Stations, Including Wireless Microphones; GN Docket No. 12-268, Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions.

To Whom It May Concern,

Nady Systems, Inc. has been a pioneer and leading manufacturer of high-fidelity wireless microphones since 1976. Over the past almost five decades, wireless microphone use, both licensed and low-power unlicensed, has become widespread and embedded in a large cross-section of the American economy. It is imperative that wireless microphone users continue to have sufficient spectrum to operate in the UHF bands free from interference from white space devices.

Preliminarily, it is important for the Commission to recognize two things. Firstly, that the UHF spectrum below channel 21 that is vacant of TV channels is insufficient to accommodate all wireless microphone operations nationwide. Secondly, digital wireless microphones and wireless in-ear monitors that utilize digital compression to reduce occupied band width are, for some existing applications, inferior to analog wireless microphones due to the unwanted effects of increased latency and decreased audio quality and battery life.

With the elimination by rule of the 600 MHz and 700 MHz bands for wireless microphone use, wireless microphone use is being squeezed for sufficient operating band width free of interference. Therefore, the Commission should retain reservation of the two UHF channels near Channel 37 for the exclusive use of wireless microphones. With

present technology, white space devices that would operate in those channels cannot guarantee that they will not interfere with the operations of wireless microphones.

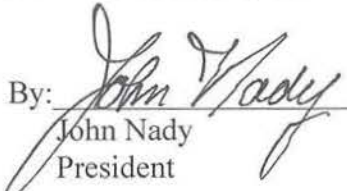
The guard bands spectrum proposed by the Commission should be open to wireless microphones without requiring them to use the technologies required of white space devices such as the ability to access a database to identify guard bands in a particular location. Wireless microphone users should be allowed to register in the data base to receive priority over white space devices or, if they don't register, have co-equal rights with them.

Wireless microphones should be allowed to continue operating in the 600 MHz band until the new incentive auction licensee provides notice to the Commission of service commencement. Many wireless microphones are not frequency agile and can operate only in the 600 MHz band. Indeed, many were purchased a mere three years ago to replace those that operated only in the 700 MHz band when the Commission prohibited use in that band. At that time, the Commission instituted waivers of Part 15 rules that allowed wireless microphones to operate on an unlicensed basis in the core TV bands (including the 600 MHz band) and that "will allow at least some of these users to make informed decisions with respect to new equipment purchases."¹ Wireless microphones may have a useful life of ten years or more.

The Commission should issue a Public Notice or Supplemental Notice of Proposed Rulemaking that proposes a rule and mechanism whereby winners of the 600 MHz incentive auction shall compensate owners of wireless microphones that operate only in the 600 MHz band for their cost of purchasing replacement wireless microphones.

Respectfully submitted,

NADY SYSTEMS, INC.

By: 
John Nady
President

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¹ In the Matter of Revisions to Rules Authorizing the Operation of Low Power Auxiliary Stations in the 698-806 MHz Band, WT Docket No. 08-166, Public Interest Spectrum Coalition, Petition for Rulemaking Regarding Low Power Auxiliary Stations, Including Wireless Microphones, and the Digital Television Transition, WT Docket No. 08-167, Amendment of Parts 15, 74 and 90 of the Commission's Rules Regarding Low Power Auxiliary Stations, Including Wireless Microphones, ET Docket No. 10-24, *Report and Order and Further Notice of Proposed Rulemaking*, 25 FCC Rcd 643, 686 ¶87 (2010).